

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** :  
: **Case No.: 14-13172**  
**Frederick Richard Reimert, Jr. AKA** : **Chapter 13**  
**Fred Reimert, Jr., AKA Frederick** : **Judge Richard E. Fehling**  
**Reimert** : **\*\*\*\*\***  
**Shannon L Reimert AKA Shannon** :  
**Reimert, FKA Shannon L McCusker** :  
: **Debtor(s).** :

**CERTIFICATE OF DEFAULT**

Now comes Wells Fargo Bank, N.A., its successor and assigns (hereinafter, "Creditor") by and through counsel, and certifies to this Court that Frederick Richard Reimert, Jr. AKA Fred Reimert, Jr., AKA Frederick Reimert and Shannon L Reimert AKA Shannon Reimert, FKA Shannon L McCusker ("Debtors") have failed to comply with the Order approving the stipulation dated July 7, 2016, a copy of which is attached hereto as Exhibit "A", by failing to make timely payments in accordance with the stipulation. Pursuant to the Order, the automatic stay will terminate upon the filing of a Certificate of Default.

Creditor hereby avers that Debtors are delinquent for the September, 2018 payment and for all arrears that were due thereafter. Further, pursuant to the terms of the stipulation, Creditor provided Debtors and their Counsel with a Notice of Default on January 11, 2019, allowing Debtors ten (10) days to cure the default. A copy of said default letter is attached hereto as Exhibit "B". Ten (10) days have passed and the default has not been cured.

WHEREFORE, upon the filing of this Certificate of Default, Creditor requests that the Court enter an order terminating the automatic stay.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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**Shannon L Reimert AKA Shannon** :  
**Reimert, FKA Shannon L McCusker** :  
: **Debtor(s).**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Certificate of Default was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500,  
Philadelphia, PA 19107

Scott F. Waterman, Chapter 13 Trustee, 2901 St. Lawrence Ave., Suite 100, Reading, PA  
19606

Shawn J. Lau, Attorney for Frederick Richard Reimert, Jr. and Shannon L Reimert, Lau &  
Associates, 4228 St. Lawrence Avenue, Reading, PA 19606, shawn\_lau@msn.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on February 4,  
2019:

Frederick Richard Reimert, Jr. AKA Fred Reimert, Jr., AKA Frederick Reimert, Shannon  
Reimert, and Shannon L Reimert AKA Shannon Reimert, FKA Shannon L McCusker, 202  
Midland Avenue, Reading, PA 19606

Wells Fargo Bank NA, 3476 Stateview Blvd., Mac #X7801-013, Fort Mill, SC 29715

DATE: 2/4/19

/s/ Karina Velter

Karina Velter, Esquire (94781)  
Adam B. Hall (323867)  
Sarah E. Barngrover (323972)  
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Attorneys for Creditor

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Velter.

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